

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE  
NORTHERN DIVISION**

|                              |   |                             |
|------------------------------|---|-----------------------------|
| <b>IN RE:</b>                | ) | <b>Case #: 21-30324-SHB</b> |
|                              | ) | <b>Chapter 13</b>           |
| <b>Timothy Kenneth Dane,</b> | ) |                             |
| <b>Shelly Lee Dane,</b>      | ) |                             |
|                              | ) |                             |
| <b>Debtors.</b>              | ) |                             |

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**REPLY TO OBJECTION BY CHAPTER 13 TRUSTEE TO PAYMENT OF SECURED  
CLAIM FILED BY U.S. BANK TRUST NATIONAL ASSOCIATION C/O SN  
SERVICING CORPORATION (#05) PENDING FURTHER DOCUMENTATION**

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U.S. Bank Trust National Association, as Trustee of the Bungalow Series III Trust ("Creditor"), by and through its undersigned counsel, hereby replies to the Chapter-13 Trustee's objection to payment of Creditor's Claim No. 5, and in support thereof, states as follows:

1. Creditor has filed an amended Claim No. 5 to which is attached a copy of the recorded deed of trust, which addresses the Trustee's objection to payment of the Claim.

WHEREFORE, Creditor requests this Honorable Court overrule the Trustee's objection and allow the Claim to be paid.

Respectfully submitted,

By: /s/Edward D. Russell  
Edward D. Russell, #026126  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of August 2021, a true and exact copy of the foregoing Reply to Objection to Payment of Claim has been sent to Timothy and Shelly Dane, 4833 Smithwood Rd., Knoxville, TN 37918; counsel for the Debtors, Clark & Washington, LLC, 408 S. Northshore Drive, Knoxville, TN 37919, by electronic notice; Gwendolyn M. Kerney, Chapter 13 Trustee, P. O. Box 228, Knoxville, TN 37901, by electronic notice; United States Trustee, 800 Market Street, Suite 114, Howard H. Baker Jr. U.S. Courthouse, Knoxville, TN 37902, by electronic notice; and, electronically to those identified on the CM/ECF system for this case.

/s/Edward D. Russell

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